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*Attorneys for Brandon Wade
 and Reflex Media, Inc.*

IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

JUSTYN HORNOR, an individual,
 Plaintiff,

v.

BRANDON WADE, an individual;
 REFLEX MEDIA, INC., a Nevada
 corporation; and ROE ENTITIES I–V,
 inclusive,

Defendants.

Case No. 2:22-cv-01840

NOTICE OF REMOVAL

Magistrate Judge

Pursuant to 28 U.S.C. §§ 1441, and 1446, Defendants Brandon Wade and Reflex Media, Inc., (collectively “*Defendants*”) give notice of removal of the above-entitled action from the Eighth Judicial District Court, Clark County, State of Nevada, to the United States District Court for the District of Nevada. The removal of this action is made pursuant to 28 U.S.C. § 1331 as the Complaint pleads a federal question. Plaintiff’s claims and supporting allegations are based in federal law, specifically Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.*, and the Family and Medical Leave Act of 1993, 29 U.S.C. § 2601 *et seq.* In support of this Notice, Defendants state as follows:

1. On or about October 5, 2022, Plaintiff Justyn Hornor filed his complaint in the Eighth Judicial District Court, Clark County, State of Nevada, as *Justyn Hornor v. Brandon Wade and Reflex Media, Inc.*, Case No. A-22-859447-C, Dept. No. 27 (the “*State Court Action*”).

1 2. On or about October 12, 2022, Defendant Reflex Media, Inc., was personally
2 served with a copy of the Summons and Complaint filed in the State Court Action.

3 3. On or about October 25, 2022, Defendant Brandon Wade was personally served
4 with a copy of the Summons and Complaint filed in the State Court Action.

5 4. This Notice of Removal is being filed within thirty (30) days of the date that
6 Defendants first received a copy of the summonses and complaint. Therefore, this Notice of
7 Removal is timely filed pursuant to [28 U.S.C. § 1446\(b\)\(1\)](#).

8 5. Venue is proper in this district under [28 U.S.C. § 1441\(a\)](#) because this district and
9 division embrace the place where the removed action has been pending.

10 6. Removal is proper because the majority of claims brought by Plaintiff are brought
11 under federal law pursuant to Title VII of the Civil Rights Act of 1964 and the Family and Medical
12 Leave Act of 1993. Nevada Revised Statute 613.330 is simply Nevada's version of Title VII, and
13 both encompass the exact same allegations: religious discrimination, retaliation, failure to
14 accommodate and a hostile work environment. The tort causes of action are based on the same
15 set of factual allegations concerning Plaintiff's employment and termination.

16 7. Plaintiff made a demand for a jury trial in his Complaint in the State Court Action.

17 8. All defendants consent to removal of this action.

18 9. Defendant Brandon Wade is an individual residing in Clark County, State of
19 Nevada.

20 10. Defendant Reflex Media, Inc., is a domestic corporation, doing business in Clark
21 County, State of Nevada.

22 11. Pursuant to [28 U.S.C. § 1446\(d\)](#), a copy of this Notice of Removal is being served
23 on Plaintiffs and filed with the Clerk of the Court in the State Court Action, together with a copy
24 of the exhibits attached hereto. A copy of all pleadings in the State Court Action is attached hereto
25 as Exhibit 1.

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1 WHEREFORE, Defendants Brandon Wade and Reflex Media, Inc., respectfully request
2 that this Court assume full jurisdiction of this proceeding for all purposes as if originally filed in
3 this Court and issue any orders necessary to stay proceedings in the State Court Action.

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5 DATED: November 1, 2022

SF FIRM, LLP

6 /s/ Mark L. Smith
7 Mark L. Smith
8 *Attorneys for Plaintiffs*
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CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2022, the foregoing **NOTICE OF REMOVAL** was served on the person(s) named below via CM/ECF and electronic mail:

Andre M. Lagomarsino, Esq.
LAGOMARSINO LAW
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_____/s/ Pia Martinez